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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

PETER BYRNE, ) CASE NO. 3:20-cv-07478-JSC  
Plaintiff, )  
) **JOINT STATUS REPORT; [PROPOSED]**  
) **ORDER**  
v. )  
)  
U.S. OFFICE OF FOREIGN ASSETS )  
CONTROL, )  
)  
Defendant. )

Pursuant to the Court's order (ECF 25), the parties submit the following joint report:

1. On June 11, 2021, the U.S. Office of Foreign Assets Control (“OFAC”) completed its initial response and corresponding productions to the underlying FOIA request, save for outstanding consultations to other agencies and other components. Since then, OFAC has made two supplemental productions, which reflect the resolution of two of those consultations. OFAC has also provided an updated, draft *Vaughn* index to reflect the latest response status.

2. OFAC continues to work with the remaining agencies and components to resolve the outstanding consultations. However, the continued COVID-19 telework status, along with other litigation obligations made upon the consulting agencies and components, have resulted in delays.

3. By February 28, 2022, OFAC will provide plaintiff with a third supplemental production, which will reflect the resolution of one of the remaining consultation responses. OFAC will update its

draft *Vaughn* index at the same time.

4. As OFAC receives the final consultation responses, it will provide an updated draft *Vaughn* index incorporating each one. If OFAC is able to resolve all outstanding consultations by March 16, 2022, it intends to file a motion for summary judgment by May 27, 2022.

5. Thus, the parties stipulate and propose that they file a joint status report by March 16, 2022.

DATED: February 11, 2022

Respectfully submitted,

STEPHANIE M. HINDS  
United States Attorney

*/s/ Benjamin J. Wolinsky*  
BENJAMIN J. WOLINSKY  
Assistant United States Attorney

Attorneys for Defendant

DATED: February 11, 2022

DAVIS WRIGHT TREMAINE LLP

/s/ Thomas R. Burke<sup>1</sup>  
THOMAS R. BURKE

Attorneys for Plaintiff

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<sup>1</sup> In compliance with Civil Local Rule 5-1(i)(3), the filer of this document attests under penalty of perjury that counsel for Plaintiff has concurred in the filing of this document.

1                   **[PROPOSED] ORDER**

2 Pursuant to the stipulation of the parties, it is hereby ordered that:

- 3 1. The parties will provide the Court with a joint statement by March 16, 2022.

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5 IT IS SO ORDERED.

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7 DATED: February 11, 2022

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*Jacqueline Scott Corley*  
HON. JACQUELINE SCOTT CORLEY  
United States Magistrate Judge